

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

JAMES S. ALLEN, JR.,)	
)	
Plaintiff,)	
)	
And)	
)	
NANCY T. ALLEN)	
)	
Counterclaim Plaintiff,)	
v.)	Case No.: _____
)	
PIA ASSETS, LLC,)	
RP GOLF, LLC,)	
AND)	
FIVESTAR LIFESTYLES, LLC)	
)	
Defendants and,)	
Counterclaimants,)	
)	
And)	
)	
PANDI CAPITAL, LLC,)	
PANDI DEVELOPMENT, LLC,)	
NEAL L. PATTERSON, and)	
CLIFFORD W. ILLIG,)	
)	
Intervenor-Defendants)	
and Counterclaimants.)	

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1441, and 1446, Defendants PIA Assets, LLC (“PIA”); RP Golf, LLC (“RP”); Fivestar Lifestyles, LLC (“Fivestar”); Pandi Capital, LLC (“Pandi Capital”); Pandi Development, LLC (“Pandi Development”); Neal L. Patterson, and Clifford W. Illig (collectively, “Defendants”), hereby remove this action, Case No. 13AE-CV00013 (the “Action”) from the Circuit Court of Platte County, Missouri to the United States District Court for the Western District of Missouri, the division of the district court of the United States within

which the Action is pending. In support of removal, Defendants, state as follows:

1. On October 4, 2016, Plaintiffs filed claims in the Action under 18 U.S.C. § 1962, for which this Court has original federal question jurisdiction under 28 U.S.C. § 1331, making this case removable under 28 U.S.C. § 1441.

2. This Notice of Removal is timely filed in compliance with 28 U.S.C. § 1446(b) because it is filed within 30 days after Defendants were served with the pleading by which Plaintiffs first asserted their federal claims in the underlying action.

3. All of the remaining claims in the Action are within the supplemental jurisdiction of this Court, 28 U.S.C. § 1367.

3. All Defendants join in the removal of this action.

4. Attached hereto as Exhibits 1-29 are copies of all process, pleadings, and orders served upon Defendants in the Action:

Exhibit Number	Description of Filing
1	Petition
2	PIA and RP's answer to petition
3	Order withdrawing attorney
4	Order granting extension of time
5	Order re: stay
6	Order denying motion to amend
7	Order granting motion to intervene
8	Pandi Development, Patterson, and Illig's answer to petition
9	Pandi Capital's answer to petition
10	Plaintiffs' answer to counterclaims of Pandi Development, Patterson, and Illig
11	Plaintiffs' answer to counterclaims of Pandi Capital
12	Order granting extension of time
13	PIA's answer to cross-claims of Pandi Capital
14	PIA, RP, and Fivestar's answer to counterclaims
15	Pandi Development, Patterson, and Illig's answer to Plaintiffs' counterclaims
16	Pandi Capital's answer to Plaintiffs' counterclaims
17	Plaintiffs' answer to PIA's counterclaims
18	Order adding plaintiff
19	Order granting motion to amend
20	Plaintiff's first amended answer to and counterclaims against Pandi Capital, Pandi

	Development, Patterson, and Illig
21	Joint confidentiality and protective order
22	Order denying opposition to protective order
23	Order denying motion for protective order
24	Pandi Development, Patterson, and Illig's answer to Plaintiffs' first amended counterclaims
25	Order granting motion to compel
26	Order continuing trial
27	Order granting motion to quash
28	Defendants' consent to Plaintiffs' motion for leave to amend petition and answer to and counterclaims against Defendants' counterclaims and cross-claims
29	Plaintiffs' second amended petition, and second amended answer to and counterclaims against Defendants' counterclaims and cross-claims

5. Written notice of the filing of this Notice of Removal is being given promptly to Plaintiffs by service hereof, and a copy of this Notice of Removal is being promptly filed with the Circuit Court of Platte County, Missouri.

WHEREFORE, the Action is hereby removed from the Circuit Court of Platte County, Missouri to the United States District Court for the Western District of Missouri, pursuant to 28 U.S.C. §§ 1441 and 1446.

Dated: October 17, 2016

Respectfully submitted,

GERMAN MAY PC

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on this 17th day of October, 2016, the foregoing document was filed with the Clerk of the Court by using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Phillip G. Greenfield
Attorney for Defendants